

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

CHARITY HALASZ and THOMAS) Case No.: 1:22-cv-13158-TLL-PTM
HALASZ, on Behalf of their Child,)
H.H., a Minor,) HON. THOMAS L. LUDINGTON
Plaintiff,)
v)
CASS CITY PUBLIC SCHOOLS, in its)
Official Capacity; WILLIAM HARTZELL)
(in his Official and Individual Capacity);)
ALLISON ZIMBA (in her Official and)
Individual Capacity); DONALD MARKEL)
(in his Official and Individual Capacity);)
and STACEY BLISS (in her Official and)
Individual Capacity),)
Defendants.)
)

KEITH ALTMAN (P 81702)
Attorney for Plaintiffs
33228 West Twelve Mile Road, Suite 375
Farmington Hills, Michigan 48331
248/987-8929
keithaltman@kaltmanlaw.com

GREGORY W. MAIR (P 67465)
KAILEN C. PIPER (P 82865)
Attorney for Defendants
300 St. Andrews Road, Suite 302
Saginaw, Michigan 48638
989/790-0960
gmair@owdpc.com; kpiper@owdpc.com

DEFENDANTS' EXHIBIT LIST

NOW COME the above named Defendants by and through their Attorney, KAILEN C. PIPER, and hereby lists the following Exhibits.

NOW COME Defendants through their Attorneys and for their Exhibit List, state as follows:

1. Any and all materials and/or reports regarding the subject incident;
2. Any and all surveillance pertaining to the subject incident;
3. Any and all video footage pertaining to the Plaintiff or the subject incident;
4. Any and all photographs related to the subject action;
5. Any and all notes, memorandums, writings or documents of any kind or nature known to the Plaintiff and/or in the Plaintiff's possession relative to the Plaintiff or the matters at issue in the instant litigation;
6. Any and all documents and other information of any kind or nature contained upon any computer, hard drive and/or computer disk relating to the matters at issue in the instant action;
7. Any and all correspondence, to include texts and email correspondence, relating to the incidents at issue in this litigation;
8. Any and all emails, notes or correspondence between Plaintiff, Plaintiff's minor, H.H. and/or anyone acting on behalf of Plaintiff or Plaintiff's

minor, H.H. with anyone from the Cass City Public Schools regarding Plaintiff and/or Plaintiff's minor, H.H.;

9. Any and all medical records pertaining to the Plaintiff and/or minor Plaintiff in this action;
10. All Exhibits disclosed by way of written discovery requests;
11. All Exhibits listed by the other parties hereto whether or not utilized by them;
12. All Exhibits made known or necessary by discovery;
13. All Exhibits made known or necessary as a result of the jury Trial of this cause;
14. These Defendants reserve the right to amend and/or add additional Exhibits as they become known through the course of discovery.

Respectfully submitted,

Date: May 8, 2023

/s/ KAILEN C. PIPER (P 82865)

Attorney for Defendants
300 St. Andrews Road, Suite 302
Saginaw, Michigan 48638

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send confirmation of such filing to the following:

Keith Altman

keithaltman@kaltmanlaw.com

Gregory W. Mair

gmair@owdpc.com
dmcclure@owdpc.com
sheryl@owdpc.com
jmconnolly@owdpc.com

Kailen Piper

kpiper@owdpc.com
jmconnolly@owdpc.com

Respectfully submitted,

Date: May 8, 2023

/s/ KAILEN C. PIPER (P 82865)

Attorney for Defendants
300 St. Andrews Road, Suite 302
Saginaw, Michigan 48638